

BEFORE THE
POSTAL RATE COMMISSION
WASHINGTON, D.C. 20268-0001

RECEIVED

SEP 17 2 12 PM '97

Postal Rate and Fee Changes, 1997

Docket No. 897-1

POSTAL RATE COMMISSION
OFFICE OF THE SECRETARY

**NEWSPAPER ASSOCIATION OF AMERICA
INTERROGATORIES TO
UNITED STATES POSTAL SERVICE WITNESS
MICHAEL D. BRADLEY (NAA/USPS-T14-19-20)
September 17, 1997**


The Newspaper Association of America hereby submits the attached interrogatories to United States Postal Service witness Michael D. Bradley (NAA/USPS-T14-19-20) and respectfully requests a timely and full response under oath.

Respectfully submitted,

NEWSPAPER ASSOCIATION OF AMERICA

Robert J. Brinkmann
NEWSPAPER ASSOCIATION OF AMERICA
529 14th Street, N.W.
Suite 440
Washington, D.C.
(202) 638-4792

By:


William B. Baker
Michael Yourshaw
WILEY, REIN & FIELDING
1776 K Street, N.W.
Washington, DC 20006-2304
(202) 429-7255

CERTIFICATE OF SERVICE

I hereby certify that I have this date served the instant document on all participants of record in this proceeding in accordance with section 12 of the Rules of Practice.

September 17, 1997


Michael Yourshaw

NEWSPAPER ASSOCIATION OF AMERICA
INTERROGATORIES TO
UNITED STATES POSTAL SERVICE WITNESS
MICHAEL D. BRADLEY (NAA/USPS-T14-19-20)

NAA/USPS-T14-19. Please refer to your response to Interrogatory NAA/USPS-T14-18(c).

- a. On average, how many piece-handlings per day would it take to achieve 100,000 piece-handlings per accounting period?
- b. Please provide the average number of piece-handlings per accounting period for a mid-sized MODS facility by type of mail processing equipment (BCS and OCR).
- c. How many accounting periods does it typically take for newly-installed automated equipment to achieve the 100,000 piece-handling per accounting period threshold?

NAA/USPS-T14-20. Please refer to your response to Interrogatory NAA/USPS-T-14-12. Assume that a hypothetical facility currently uses one BCS machine and plans to install a second machine because of projected increases in bar-coded mail volume.

- a. Is it reasonable to expect that the total amount of time spent by facility workers on BCS set-up and any related activities will double after installation of the second machine? If no, please explain why not.
- b. Assume that the hypothetical facility later decides to remove the second BCS machine because of projected future decreases in bar-coded mail volume. Is it reasonable to expect that the total amount of time spent by facility workers on BCS set-up and any related activities will be half that required with two BCS machines? If no, please explain why not.
- c. Please explain how set-up time and related activities vary as a function of the number of machines at a facility.